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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Office of the Secretary

In the Matter of

Advanced Television Systems
and Their Impact on the Existing
Broadcast Service

MM Docket No. 87-268

STATEMENT OF MST AND NAB

On August 20, 1987 the Commission released the text of a Notice of Inquiry into Advanced Television Systems (ATV) initiated in response to a joint petition by the Association of Maximum Service Telecasters, Inc., the National Association of Broadcasters and 56 other broadcast organizations and companies. Petition for Notice of Inquiry (filed February 13, 1987) (hereinafter "Joint Petition"). One of the important issues to be addressed in this Inquiry is the advantages and disadvantages of various alternatives for providing additional spectrum capacity for ATV systems. Notice of Inquiry ¶ 46-58. NAB and MST are concerned that the text of the Notice of Inquiry is misleading regarding the position of the Joint Petition on this issue and submits this statement for clarification.

As the Commission notes in the Notice of Inquiry it may be possible to implement an ATV service within the existing VHF and UHF spectrum using the existing channel assignments and certain augmentation channels. Id. at ¶ 49.

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The Joint Petition specifically urged investigation of this option, see Joint Petition at 27-28, and MST subsequently filed a preliminary and partial spectrum study suggesting how advanced systems might be implemented without requiring existing stations to shift channels. Preliminary and Partial Study of the Use of the UHF Band to Accommodate Local High Definition Television (filed March 10, 1987).

The Notice of Inquiry, however, identifies the Joint Petition with the far more drastic option of "repacking" the existing allocations. It states "as suggested in the MST petition, additional spectrum capacity might be obtained through partial or total 'repacking' of the VHF and UHF band." Id. at ¶ 49. Although the Joint Petition listed repacking as an option that the Commission might want to consider, it noted that repacking was among the options which the joint petitioners "emphatically do not endorse Indeed, all or most of the undersigned might well oppose these options." Joint Petition at 28.

As noted in the Joint Petition, repacking "is a radical measure which clearly would entail enormous disruption and expenditures." Id. We wish to clarify this point now, well in advance of the comment deadline, so that our fellow broadcasters and others do not misunderstand our position on repacking and spend unnecessary resources addressing the issue. We also wish the Commission, its Advisory Committee and other groups who will be working on

ATV issues -- and whose efforts and interest we greatly appreciate -- to understand that broadcasters have grave reservations about repacking even as a last resort.

Respectfully submitted,

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